

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION**

UNITED STATES OF AMERICA,)	Case No.: 1:15CR-069
)	
Plaintiff,)	
)	
vs.)	MOTION TO MAINTAIN INMATE AT
)	CURRENT FACILITY
)	
JASON Gmoser,)	
)	
Defendant.)	
)	

Now comes the Defendant, by and through undersigned counsel, and hereby requests this honorable Court to issue an order allowing inmate Jason Gmoser, to be allow to remain in his current placement in Federal facility in Lexington, Kentucky. Inmate Gmoser has been placed there because of a competency evaluation. Lexington is also equipped with the necessary personnel and equipment to accommodate his needs. Inmate Gmoser has had back surgery since his original incarnation and has still not received his neurological follow up. He also has suffered from incontinence. He also has dental needs that can be accommodated while in Lexington. Due to the close proximity to the court and counsel we ask the court to allow inmate Jason Gmoser to be maintained at his current placement.

Respectfully submitted,
CAPARELLA-KRAEMER & ASSOC., LLC

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and accurate copy of the foregoing has been served upon Counsel of Record via e-mail on this 17th day of February, 2017.

s/Bradley M. Kraemer
Bradley M. Kraemer (0070329)
Courtney Caparella-Kraemer (0077016)
Attorney for Defendant